

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

U.S. DISTRICT COURT
EASTERN DISTRICT - WI
FILED

2020 AUG -4 P 12:51

CLERK OF COURT

20-CR-137

UNITED STATES OF AMERICA,

Plaintiff,

v.

DEVERY MOSES,

Defendant.

Case No. 20-CR-

[18 U.S.C. § 2251(a)]

INDICTMENT

THE GRAND JURY CHARGES THAT:

From on or about April 14, 2019, through April 26, 2019, in the State and Eastern District of Wisconsin and elsewhere,

DEVERY MOSES

knowingly attempted to employ, use, persuade, induce, entice, and coerce JV-1, a minor under the age of 18, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, to wit: attempting to obtain a visual depiction of JV-1, a minor under the age of 18, engaging in the lascivious exhibition of her genitals, which visual depiction the defendant knew and had reason to know would be mailed and transported across state lines and in foreign commerce.

In violation of Title 18, United States Code, Section 2251(a).

FORFEITURE NOTICE

1. Upon conviction of an offense in violation of Title 18, United States Code, Section 2251, set forth in this Indictment, the defendant shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 2253:

- a. Any visual depiction described in Title 18, United States Code, Sections 2251, 2251A, 2252, 2252A, 2252B, or 2260, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Title 18, United States Code, Chapter 110;
- b. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and
- c. Any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

2. The property to be forfeited includes, but is not limited to, a sum of money equal to the proceeds derived from the offense.

3. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third person; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other

property which cannot be subdivided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b), and Title 28, United States Code, Section 2461(c).

A TRUE BILL:

[REDACTED]

FOREPERSON

Dated: August 4, 2020

for Margaret B. Hite
MATTHEW D. KRUEGER
United States Attorney